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Local Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**RAMA SOU; TAI BUI; and SCOTT  
ZIMMERMAN,**

Plaintiffs,

v.

**MICHAEL BASH; JEREMY BASH;  
BERKLEY ENTERPRISES, INC.;  
PEPPERDINE ENTERPRISES, INC.;  
NINETY-FIVE FORT APACHE  
COMPLEX, LLC; ROYAL VIEW,  
LLC; and DOES 1 through 20,  
inclusive,**

Defendants

Case No. 2:15-cv-00698-APG-VCF

**STIPULATED REQUEST FOR  
PRETRIAL CONFERENCE**

**(FIRST REQUEST)**

**STIPULATED REQUEST FOR PRETRIAL CONFERENCE**

Plaintiffs Rama Sou, Tai Bui, and Scott Zimmerman (collectively, "Plaintiffs"), on the one hand, and defendants Michael Bash, Jeremy Bash, Berkley Enterprises, Inc., Pepperdine

Enterprises, Inc., Ninety-Five Fort Apache Complex, LLC, and Royal View, LLC (collectively, “Defendants”), on the other hand, by and through their respective counsel, hereby stipulate as follows:

Pursuant to D. Nev. LR 6-1 and 16-2, as well as the Court’s Minute Order of November 9, 2016 [ECF Dkt. 98] and counsel for Defendants’ appearance on December 3, 2016, the parties request a pretrial conference regarding outstanding discovery and the depositions as stated on the record during the November 9, 2016 hearing on Defendants’ Motion to Withdraw as Attorney [ECF Dkt. 92].

The parties further request that the conference take place after 10:00 a.m. on Monday, December 12, 2016, or at another time thereafter which may be convenient for the court. The parties’ request for a Monday hearing on the pretrial conference is premised on the fact that Mr. Edward Suh, counsel for Plaintiffs, has already made plans to travel from California to Las Vegas for the depositions of Jeremy Bash, Michael Bash, Berkley Enterprises, Inc., and Ninety-Five Fort Apache Complex, LLC. These depositions were noticed for December 12, 13, and 14, respectively.<sup>1</sup> Notice of these depositions preceded appearance of new counsel for defendants in this case on December 3, 2016.<sup>2</sup>

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<sup>1</sup> Specifically, on November 21, 2016, Plaintiffs noticed the deposition of Jeremy Bash was noticed for December 12, 2016, and Michael Bash for December 13, 2016. Copies of these depositions were mailed to defendants at their appropriate contact addresses. On November 30, 2016, having not received notification that the individual defendants had retained new counsel, Plaintiffs noticed the depositions of Ninety-Five Fort Apache Complex, LLC (December 14, 2016, at 9:00 a.m.), and Berkley Enterprises, Inc. (December 14, 2016, at 1:00 p.m.). On November 30, 2016, Plaintiffs also noticed the depositions of Royal View, LLC (December 19, 2016 at 9:00 a.m.), and Pepperdine Enterprises, Inc. (December 19, 2016, at 1:00 p.m.). Copies of all 30(b)(6) deposition notices were mailed to the addresses listed on the Nevada Secretary of State website.

<sup>2</sup> On December 3, 2016, new counsel for defendants noticed his appearance. ECF Dkt. 99. Later that day, counsel for plaintiffs provided courtesy copies of all six deposition notices to defendants’ counsel.

IT IS SO STIPULATED.

<b>KNEPPER &amp; CLARK LLC</b>  <u>/s/ Miles N. Clark</u> MATTHEW I. KNEPPER Nevada Bar No. 12796 MILES N. CLARK Nevada Bar No. 13848 10040 W. Cheyenne Ave., Suite 170-109 Las Vegas, NV 89129  <b>LAW OFFICES OF MICHAEL K. SUH &amp; ASSOCIATES</b>  EDWARD W. SUH CA Bar No. 265356 <i>Admitted Pro Hac Vice</i> 3810 Wilshire Boulevard, Suite 1212 Los Angeles, Ca 90010  <i>Attorneys for Plaintiffs</i>	<b>LAW OFFICE OF ANDREW H. PASTWICK</b>  <u>/s/</u> ANDREW HENRY PASTWICK Nevada Bar No. 9146 1810 E. Sahara Avenue Suite 120 Las Vegas, NV 89104 702-866-9978 Fax: 702-369-1290 Email: apastwick@pastwicklaw.com
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

December 9, 2016

DATED: \_\_\_\_\_

IT IS HEREBY ORDERED that a pretrial conference is scheduled for 1:00 p.m., December 12, 2016, in Courtroom 3D.

**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2016, I electronically filed the foregoing **STIPULATED REQUEST FOR PRETRIAL CONFERENCE AND REQUEST FOR TELEPHONIC PARTICIPATION (FIRST REQUEST)** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/S/ MILES N. CLARK  
KNEPPER & CLARK LLC